

FILED

JUN 13 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER LEE COLLINS, JR.,

Defendant.

No.

4:19CR00443 RLW/NAB

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Katharine A. Dolin, Special Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.
2. According to St. Louis County Investigative Report #19-12364, on March 14, 2019, officers were dispatched to a call of shots fired at a residence on Balboa Drive. Inside, officers made contact with the defendant, Christopher Collins, and his friend, Aryk Brown. Collins and Brown indicated that a person named "Mike" had been shooting into the residence. Upon investigation, officers determined that the shots had originated from inside, rather than outside, the home and confronted Collins and Brown. Collins and Brown indicated that, indeed, Brown had shot from inside the home towards the street outside. Brown then gave the firearm to Collins to hide in the basement. Collins directed officers to a firearm and magazine hidden in an air duct in the basement.

3. Defendant committed this offense while on state parole. This is not the first time he has failed on supervision. He has been previously been arrested once for a parole violation and *six times* for probation violations. Defendant's inability to comply with the law while on parole is indicative of his danger to the community were he to be released on bond in this case.

4. Defendant's lengthy criminal history includes a 2013 conviction for second-degree burglary (12SL-CR02295-01), 2014 convictions for second-degree burglary and first-degree property damage (1422-CR00005-01), and a 2016 conviction for felony possession of a firearm (15SL-CR02777-01). He also has arrests not resulting in convictions for: felony theft, resisting/interfering with arrest, second-degree burglary (multiple), first-degree property damage, and unlawful possession of a firearm. His history of resisting apprehension creates both a flight risk and a danger to the community and his continued weapons offenses make him a danger to the community.

5. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Katharine A. Dolin
KATHARINE A. DOLIN, #64817MO
Special Assistant United States Attorney